

REMARKS

This Amendment is in response to the Office Action mailed September 15, 2004. In the Office Action claims 1-31 were rejected by the Examiner. With this Amendment claims 1, 12, 19, 23 and 27 are amended and the remaining claims are unchanged. Reconsideration and allowance of claims 1-31 are respectfully requested in view of the following remarks.

In item 2 of the Office Action, the Examiner rejected claims 1-31 under 35 U.S.C. §102(e) as being anticipated by Burrows U.S. Patent No. 6,021,419. The Applicant has reviewed the Burrows reference and must respectfully disagree.

First of all, the claims of the present invention are directed to a compressed lexicon for use in speech recognition and synthesis. However, it should be noted that Burrows only discloses an indexing process for indexing web pages, and not a lexicon for speech applications. It is clear from the disclosure of the Burrows document that there is no lexicon used or created from the web pages and that an index of words in a web page is not a lexicon for a speech application. Further, the Burrows reference is totally inapplicable for use in a speech application. Thus, the Burrows reference and the present invention are completely unrelated, and patentably distinct from each other. Therefore, for this reason it is believed that the Burrows reference cannot anticipate the present invention.

Referring now to the rejection of claims 1 and 27, the Office Action provided various citations to the Burrows patent. After reviewing the Burrows patent the Applicant offers the following observations regarding the disclosure of the Burrows patent as applied to the present invention, and in particular claim 1.

The Examiner indicated that the element "receiving a word list and word-dependent data associated with each word in the word list" is disclosed as receiving word list from parsing module containing words as well as their contents in column 6 lines 60-67 of the Burrows reference. In the section cited by the Examiner it is stated:

The parsing module 30, in a collating order of the sequential locations of the content, breaks the information of the pages 200 down into discrete indexable elements or individual "words" 300. Each word 300 is separated from adjacent

words by a word separator 210 indicated by a circle. In the index 70 each word is stored as a "literal" or character based value. It should be understood, that the terms page 200, word 300, and separator 210 are used to represent many different possible content modalities and data record specifications."

While Burrows discusses "words" in the cited section, there is no mention of word-dependent data. The Specification defines word-dependent data as that being useful in a compound lexicon in a speech recognition or speech synthesis context. See page 14, lines 20-28. Therefore, it is believed that the Burrows reference does not disclose this element of claim 1.

The Examiner indicated that the element of "selecting a word from the word list" in claim 1 is disclosed "as choosing the word" in column 11, lines 14-16 of the Burrows reference. The cited section states, "In order to prepare the pairs 400 to be indexed, the pairs are sorted first in word order, and second in location order." Nowhere in the cited section is it disclosed that a word is selected. Therefore, it is believed that this element is not disclosed by the Burrows reference.

The Examiner indicated that the element "generating an index entry identifying a location in a lexicon memory for holding the selected word" in claim 1 was disclosed in Burrows at column 11 lines 4-7. The cited section of the reference states: "As stated above, the indexing module 40 generates an index 70 of the content of the records or pages 200. The internal data structures 71-73 of the index 70 are now described first with reference to FIG. 6." This is an index of the content of a page, and not an index entry identifying a location in a lexicon memory holding the selected word. Further review of the Burrows reference indicates that this index includes each occurrence of the word in a text document and each occurrence is stored separately. However, a text document is not a lexicon memory for speech applications. Therefore, it is believed that this element is not disclosed by Burrows.

The Examiner indicated that "encoding the selected word and its associated word-dependent data" in claim 1 was disclosed on column 12 lines 50-63 and column 14 lines 48-55. The Applicant has reviewed the cited sections and these section only mention various types of encoding (binary encoding, for example), but does not disclose what is encoded. The present

invention encodes both the word and word-dependent data, which are not disclosed by Burrows. Therefore, it is believed that this element is not disclosed by Burrows.

For the above reasons, it is believed that Burrows cannot anticipate claim 1. Furthermore, claims 2-11 are believed allowable as well either independently or by virtue of their dependency either directly or indirectly from allowable claim 1. The Examiner indicated that claim 27 is rejected for similar reasons as claim 1. Again for the above reasons it is believed that claim 27 is allowable over Burrows, as well as dependent claims 28-31. Reconsideration and withdrawal of the associated rejections are respectfully requested.

The Examiner rejected claim 12 by citing column 5, lines 15-35 and column 6, lines 17-42 of the Burrows reference. However, as discussed above Burrows does not disclose "accessing an index to obtain a word location in the compressed lexicon that contains information associated with the received word." In particular, Burrows makes no disclosure of any lexicon for a speech application, from which a word can be obtained. Therefore, as Burrows makes no disclosure of a lexicon for a speech application, it cannot disclose accessing an index to obtain a location in the lexicon. Thus it is believed that claim 12 is allowable over Burrows. Further dependent claims 13-18 are believed allowable as well by virtue of their dependency either directly or indirectly from allowable claim 12. Reconsideration and withdrawal of the rejection are respectfully requested.

The Examiner rejected claims 19 and 23 as being disclosed by the Burrows reference. A careful reading of claims 19 and 23 makes clear that they are directed towards a compressed lexicon builder and a compressed lexicon accessor, both for speech applications. Further, both claims 19 and 23 make use of word-dependent data. As discussed above with regards to claim 1, Burrows does not disclose a lexicon for a speech application, nor does it disclose word-dependent data for this context. Therefore, it is believed that the Burrows reference does not anticipate claims 19 and 23. Furthermore, dependent claims 20-22 and 24-26 are believed allowable as well by virtue of their dependency either directly or indirectly from allowable claims 19 and 23. Reconsideration and withdrawal of the rejections are respectfully requested.

In conclusion, it is believed that Burrows does not disclose, teach or suggest the elements of any of claims 1-31 as amended. Specifically, it is asserted that Burrows does not disclose a

lexicon for speech applications as is commonly understood in the art, or word-dependent data as defined in the specification. Therefore, it is asserted that claims 1-31 are allowable over Burrows. Reconsideration and allowance are respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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